

# **Georgia Department of Natural Resources**

## **Environmental Protection Division**

2 Martin Luther King Junior Dr., Suite 1462 East, Atlanta, Georgia 30334

Judson H. Turner, Director

Land Protection Branch

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Response and Remediation Program

404/657-8600

May 9, 2013

### **VIA EMAIL AND REGULAR MAIL**

# **FILE COPY**

Georgia World Congress Center Authority  
c/o Wayne Rosser, Maintenance/Physical Plant Manager  
285 Andrew Young International Blvd., NW  
Atlanta, Georgia 30313-1591

Re: Annual Groundwater Sampling Reports #6 and #7  
Landfill Maintenance and Inspection Reports, Quarters #28 - #35  
Response to Georgia EPD Comments May 20, 2011  
Northside Drive Landfill, HSI No. 10222  
457 Northside Drive, Atlanta, Fulton County, Georgia  
Tax Parcel No. 14-82-6-12-1

Dear Mr. Rosser:

The Georgia Environmental Protection Division (EPD) has completed its review of Annual Groundwater Sampling Report (Annual Report) #6, dated February 14, 2012, Annual Report #7 (February 13, 2013), Landfill Maintenance and Inspection Reports for Quarters 28/29 (July 13, 2011), Quarters 30/31 (January 31, 2012), Quarters 32/33 (August 14, 2013) and Quarters 34/35 (February 13, 2013) for the above referenced site. The documents were submitted by Tetra Tech on behalf of the Georgia World Congress Center Authority (GWCC) as required by the Monitoring and Maintenance Plan for Type 5 Risk Reduction Standards-Northside Drive Landfill, Atlanta, Georgia, December 2003, Revised July 2005 (M&M Plan). EPD appreciates the thorough manner in which GWCC and Tetra Tech inspect and monitor the engineering controls at the subject site and concurs with your proposal to monitor MM-03 and MWC-1A on a quarterly basis for the next year. EPD offers the following comments:

### **Annual Groundwater Sampling Reports**

1. EPD does not agree with certain groundwater purging recommendations provided in Section 6.1 of Annual Report #7. Groundwater field purging/sampling procedures should be consistent with current EPA Region 4 Science and Ecosystem Division (SED) Groundwater Sampling Standard Operating Procedures (SOPs) as described in SESDPROC-301-R2, effective October 28, 2011. If procedures deviate from the SOPs, justification must be provided to demonstrate that groundwater samples and/or their analytical results are not compromised. EPD noted the following potential deviations from the EPA SOP and/or M&M Plan:
  - a. Pursuant to Section 3.1 of the SESDPROC-301-R2, EPD prefers the use of purging procedures requiring the removal of at least three well volumes of groundwater as described in Sections 3.2.1 and 3.3 of the same document. Specifically, the "Traditional Multiple Volume" Method, which requires placement of the pump intake near the top of the water column during purging efforts, is the preferred method. Unless acceptable justification for use of the alternate "Tubing-In-Screen" Purging

Method at the site is provided to EPD, the preferred Traditional Multiple Volume Purge Method should be used during future groundwater sampling efforts. Please note that EPD does not agree that the approximately 50 total gallons of purge volume required at monitoring wells MWC-1B and MWC-1C warrant the use of an alternate purging method. There are a total of nine (9) wells to be sampled in the network, and based on a review of Annual Reports since 2007; the typical sampling event has lasted for no more than 2 days.

- b. Purge volume calculations or purge criteria were not provided in the field notes and groundwater sampling sheets in Report #7. Please ensure that the information is recorded appropriately during all future groundwater sampling events per Section 3.2.2 of the M&M Plan and Section 3.2.1.1.1 of the SESDPROC-301-R2.
  - c. The depth to pump intake was not recorded in the groundwater sampling data sheets as stated in Section 2.3.5.1 of Report #7. Please record the depth to pump intake in the field logbook during future sampling events.
2. The laboratory certification provided for Gulf Coast Atlantic Laboratories, LLC did not provide the scope of accreditation for the media analyzed. Pursuant to Chapter 391-3-26 of Commercial Environmental Laboratories, the Report should include a laboratory certification for all sample media that includes the name of the laboratory, name of the accreditor, accreditation ID number, scope of accreditation, and effective expiration dates of accreditation.

#### **Landfill Maintenance and Inspection Reports**

3. The dewatering well appears to be depicted close to the northwestern boundary of the slurry wall in the Site Location and Layout figures of the Quarter 32/32 and 34/35 Landfill Maintenance and Inspection Reports. Please correct the figure in future reports.

Please address the comments listed above in the next semiannual report, which is due by August 15, 2013 or the next annual report due by February 14, 2014, as appropriate. Please also note that the next Five-Year Review Report should also be submitted by February 14, 2014. GWCC may submit one paper copy and two electronic copies of all future documents exceeding 25 pages in length. If you have any questions regarding this matter, please contact Ms. Antonia Beavers of the Response and Remediation Program at (404) 657-8600.

Sincerely,



Jason Metzger  
Unit Coordinator  
Response and Remediation Program

- c: Shandra Williams, Georgia World Congress Center Authority  
Andy Kandray, Tetra Tech  
Joan Sasine, Bryan Cave Powell Goldstein

File: HSI# 10222

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